pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

July 30, 2015

Mr. James Feeney
Remedial Project Manager
U.S. EPA Region III
1650 Arch Street (3HS21)
Philadelphia, PA 19103-2029

Re: Wade (ABM) Site

Dear Mr. Feeney:

As per our June 29, 2015, discussion between the Pennsylvania Department of Environmental Protection (PADEP) and the U.S. Environmental Protection Agency (USEPA) regarding the Wade (ABM) Site (Site), we are requesting the cessation of groundwater monitoring well sampling, followed by timely, proper decommissioning of all groundwater monitoring wells (wells) located within the Site. USEPA should consider Institutional Controls to be implemented at this Site to prevent future groundwater use.

USEPA issued the Site Record of Decision (ROD) in 1984. The Post-Closure, Long-Term Monitoring Plan (included as a part of the ROD) required 30 years of monitoring to determine the effectiveness of the Site remedial activities. The ROD permits the re-evaluation of sampling protocol every five years. The Site was delisted from the National Priorities List (NPL) in 1989. Beginning in that same year, in accordance with the Site ROD and Operations and Maintenance (O&M) plan, PADEP has conducted Site operations and maintenance activities, including annual sampling of the Site wells. The Site ROD's 30-year monitoring period ends in May 2019.

The Fifth Five-Year Review completed in 2014 notes that the long-term sampling of the wells has shown a decreasing trend in contaminant concentrations, with current concentrations several orders of magnitude less than those identified in the ROD (Attachment 1). The 'No Action' groundwater remedy selected by USEPA for the Site and the downward trend of the contaminants further justifies the discontinuation of sampling and the decommissioning of monitoring wells. Currently there is no risk or exposure pathways posed by, or from, this Site. Previous Five Year Reviews conducted at this Site have not identified any risk associated with this Site and Site conditions have not changed to alter that. Area Brownfield Sites have been successfully redeveloped, after consideration of this Site and determining that there were no environmental risks associated to, or from, this Site.

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As we discussed, most of the wells are in a state of disrepair due to the heavy vehicle traffic, and have been exposed to harsh riverbank weather conditions for more than 12 years. As a result, the well covers are no longer secure and, as such, provide a direct point of contamination if a release were to occur at this location. The unsecured well covers also pose a direct hazard to the public that visit this recreational area and sports arena. In addition, the outer casings of certain monitoring wells experience flooding, owing to their proximity to the Delaware River (Attachment 2).

PADEP appreciates the opportunity to discuss decommissioning the Wade (ABM) Site wells, and we look forward to your response. If you have any questions regarding this matter, please feel free to call me at 484.250.5784, or contact me via e-mail at jocrooks@pa.gov.

Sincerely,

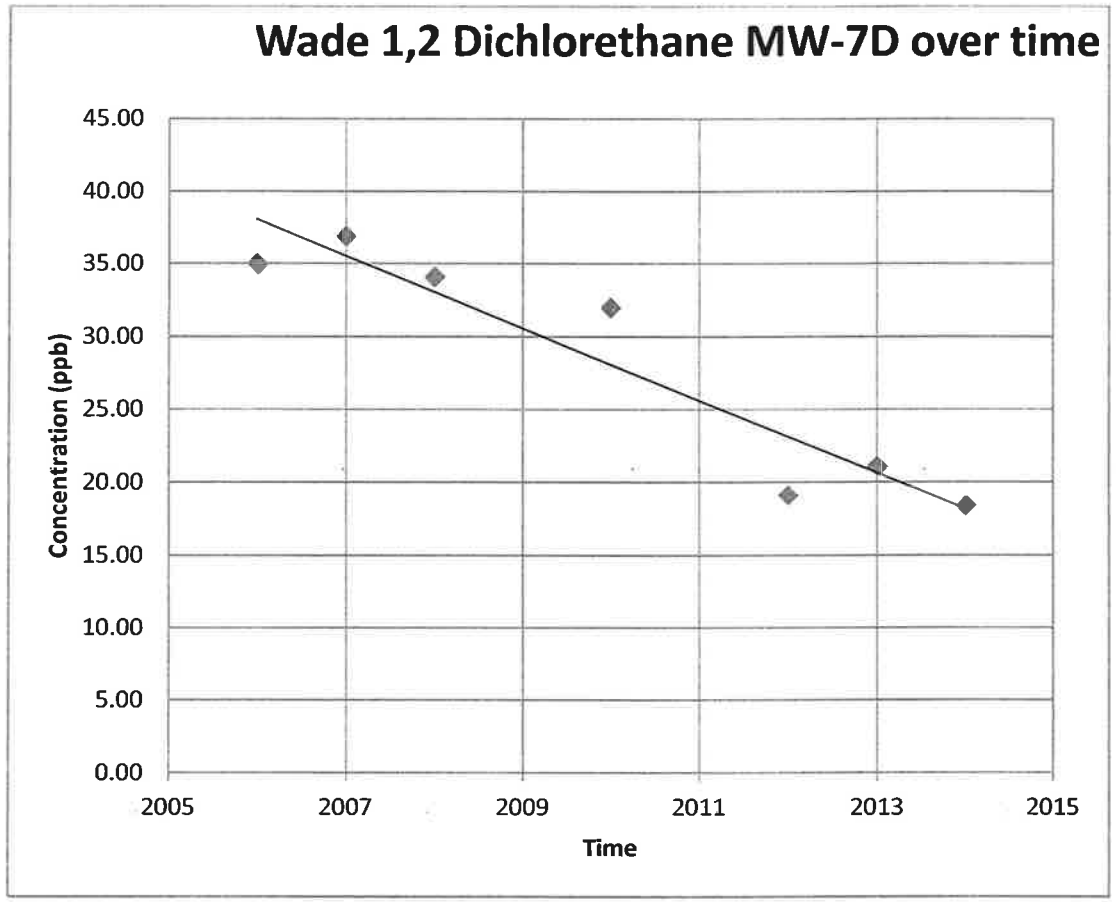
Joshua R. Crooks
Environmental Trainee
Environmental Cleanup and Brownfields

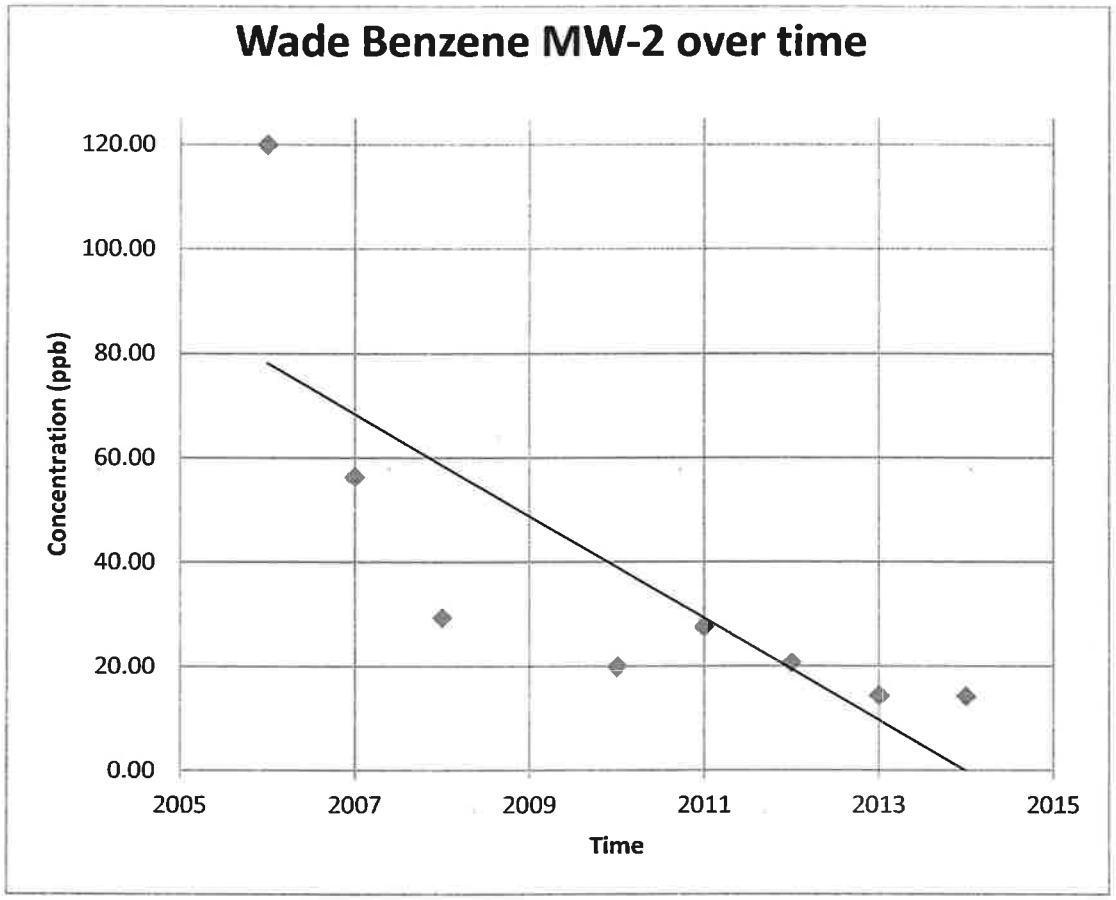
Enclosures

cc: Mr. Sinding - w/o enclosure
Mr. R. Patel - w/o enclosure
Ms. McClennen - w/o enclosure
Ms. Pantelidou, P.G. - w/o enclosure
Ms. Matzko - USEPA
Mr. Bower - USEPA
Ms. Ruark - Chester Economic Development Authority
Mr. Mitchell - Chester Parking Authority
Ms. Hennessey - Delaware County Department of Intercommunity Health
File
Re 30 (eh15ecb)211-1

**Wade - Summary of VOCs Remaining over the MSCs**

| MW-1D | MSC | 2006 | 2007 | 2008 | 2010 | 2011 | 2012 | 2013 | 2014 |
|---|---|---|---|---|---|---|---|---|---|
| 1,2-Dichloroethane | 5 | 11 | 8.7 | 7.6 | 7.2 | | | | |
| 1,2-Dichloropropane | 5 | 28 | 21.6 | 10.2 | 7.8 | | | | |
| | | | | | | | | | |
| **MW-2** | | | | | | | | | |
| 1,2-Dichloropropane | 5 | | 7.3 | | | | | | |
| Benzene | 5 | 120 | 56.4 | 29.3 | 20 | 27.6 | 20.7 | 14.4 | 14.2 |
| | | | | | | | | | |
| **MW-3** | | | | | | | | | |
| Benzene | 5 | 9 | 7.4 | | | 7.2 | | | |
| | | | | | | | | | |
| **MW-5S** | | | | | | | | | |
| Benzene | 5 | 5 | | 5.7 | | | | | |
| Chlorobenzene | 100 | | | 146 | | | | | |
| | | | | | | | | | |
| **MW-7D** | | | | | | | | | |
| 1,2-Dichloroethane | 5 | 35 | 36.9 | 34.1 | 32 | | 19.1 | 21.1 | 18.4 |
| | | | | | | | | | |
| **MW-8** | | | | | | | | | |
| Benzene | 5 | 34 | 18.3 | 14.1 | 15 | | | | |


Wade 1,2 Dichlorethane MW-7D over time
45.00
40.00
35.00
30.00
25.00
20.00
15.00
10.00
5.00
0.00
Concentration (ppb)
2005
2007
2009
2011
2013
2015
Time


Wade Benzene MW-2 over time
120.00
100.00
80.00
60.00
40.00
20.00
0.00
Concentration (ppb)
2005
2007
2009
2011
2013
2015
Time

MW-1S:Overgrown vegetation makes access to well difficult

Pictures Taken 7/10/2015

MW-1S: Well cover and cap are not secure

Pictures Taken 7/10/2015

MW-1S:Well cap is not secure

Pictures Taken 7/10/2015

MW-4D: Well cap is not secure

Pictures Taken 7/10/2015

MW-4S: Well cap is not secure and flooding has caused water to infiltrate

Pictures Taken 7/10/2015

MW-5S: Well is placed in middle of street and experiences heavy vehicle traffic causing damage to well cover

Pictures Taken 7/10/2015

MW-7S: Planks covering well are not secure and pose trip/fall hazard to pedestrians

Pictures Taken 7/10/2015

MW-7S: Planks are not secure and plywood covering well cap is rotting

Pictures Taken 7/10/2015

MW-7S

Pictures Taken 7/10/2015

MW-7D: Planks are not secure and pose trip/fall hazard

Pictures Taken 7/10/2015

MW-7D: Extensive weathering has caused plywood covering well cap to deteoriate

Pictures Taken 7/10/2015

MW-7D

Pictures Taken 7/10/2015

MW-7D

Pictures Taken 7/10/2015